Response to Comments Received During the Public Notice Period Regarding Draft WPCP NEV0095113 for the Placer Turquoise Ridge Inc. (Getchell Mine) Infiltration Project

Comments from Mr. John Hadder of Great Basin Mine Watch, received by E-Mail on November 9, 2006

Great Basin Mine Watch Comment: "Great Basin Mine Watch (GBMW) is very concerned about the potential for soluble salts and TDS contamination in the groundwater recharge zone from the rapid infiltration basins (RIB) as part of the dewatering infiltration system. A discharge rate of 1,000 to 1,500 gpm, as stated in the fact sheet, is sufficient volume to potentially create a "mound" of degraded water beneath the RIB, which would eventually dissipate or move off-site as a plume of degraded water, depending on the specific hydrodynamics of the region. This scenario has been observed elsewhere."

NDEP Response: The NDEP recognizes the potential for soluble salts and TDS to be temporarily mobilized as a result of the infiltration of dewatering water at particular sites, as well as the potential for mounding of water that may occur as a result of the operation of rapid infiltration basins. However, the existing site data does not indicate either issue to be of concern at the Turquoise Ridge Infiltration Project. It is important to note that analytical results obtained to date since 1998 from the monitoring wells required to be sampled in accordance with the water pollution control permit have shown no degradation of groundwater. Most notably, monitoring results from well DM-03 which is located downgradient of all three infiltration sites have remained consistent over time without any exceedance, demonstrating there has been no degradation of groundwater as a result of the infiltration operations.

The NDEP has observed a trend of elevated arsenic in monitoring wells MW-22 and MW-23. However, it must be noted that these readings are unrelated to the reinfiltration of mine dewatering water since both wells are located directly downgradient of an infiltration site which has not yet been placed into service. The Placer Turquoise Ridge mine facilities are located in an area well known for arsenic mineralization and the arsenic level in these two wells is consistent with other wells upgradient of the infiltration site and as such, is believed to be a result of ambient groundwater conditions.

Lastly, as an additional measure to expand upon the existing monitoring program, the NDEP has incorporated within the renewed water pollution control permit, a schedule-of-compliance item that requires the installation of five new monitoring wells. The new wells will be used to monitor groundwater quality both upgradient and downgradient of

the infiltration sites, and piezometers will be used to monitor for any potential water mounding that may occur with the continued operation the infiltration basins.

Great Basin Mine Watch Comment: "The reinfiltration of dewatering water is a man-induced alteration of groundwater, and therefore, the increases in soluble salts and TDS due to leaching is indeed pollution. The pollution caused by this leaching clearly impairs the beneficial use of the water and violates the legislature's intent when it passed the Nevada Water Pollution Control Act.

For this reason Great Basin Mine Watch is opposed to the renewal of Water Pollution Control Permit NEV0095113, and requests an alternative procedure to avoid this potential contamination. We recommend instead a direct injection of dewatered water be implemented. We would be very open to discussing such alternatives with NDEP at any time."

NDEP Response: The NDEP is appreciative of the provided comments and recommendations and we remain receptive to the discussion of warranted alternatives for any project. However, as noted in the NDEP response above, the site monitoring data simply does not support the GBMW comment of alleged pollution due to the infiltration of dewatering water. Monitoring data from both the water infiltrated at this project and the surrounding groundwater wells have all been within established water quality limits. As such, the Division has been provided with sufficient information, in accordance with Nevada Administrative Code (NAC) 445A.350 through NAC 445A.447, to assure the Division that the groundwater quality will not be degraded by this operation, and that public safety and health will be protected. Monitoring, in accordance with the water pollution control permit, will ascertain continued compliance with the regulations.